## Case 3:17-cv-02216-G Document 19 Filed 12/22/17 Page 1 of 4 PageID 186

# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

88888888

§

§

§ §

§ § §

§ § §

§ §

SANTOS GARCIA, GREGORIO	
VASQUEZ and MIRNA ABIGAIL CASTRO Individually and on Behalf of All Others Similarly Situated	,
Plaintiffs,	
,	

Civil Action No. 3:17-cv-2216-G

E-LOGIC, INC., DWW ABATEMENT, INC., HESTER ENVIRONMENTAL, d/b/a TEAM ENTERPRISE, CACTUS ABATEMENT & DEMOLITION, LLC, ONEAL GROUP, INC., CHARLES ONEAL and PHILIP HESTER

Defendants.

v.

# <u>DEFENDANTS' UNOPPOSED MOTION TO EXTEND TIME TO FILE ANSWER</u> <u>OR OTHERWISE RESPOND TO PLAINTIFFS' SECOND AMENDED COMPLAINT</u>

Defendants E-Logic, Inc., DWW Abatement, Inc., Hester Environmental, D/B/A Team Enterprise, Cactus Abatement & Demolition, LLC, Oneal Group, Inc., Charles Oneal and Philip Hester ("Defendants") file this Agreed Motion to Extend Time to file Answer or to otherwise respond to Plaintiffs' Second Amended Complaint.

Defendants and Plaintiffs are engaged in productive settlement discussions. Defendants believe that an extension of time to file an Answer or to otherwise respond to Plaintiffs' Second Amended Complaint will aid in the continued progress of settlement discussions. With Plaintiffs' agreement, Defendants ask the Court to extend the answer deadline date until January 18, 2018.

Defendants request to extend time is for good cause and is not intended to delay these proceedings. This extension will allow the Parties to continue negotiations in this matter without having to accrue additional attorney fees.

2018.

## Respectfully submitted,

/s/ Caroline C. Harrison

Lu Pham
<a href="mailto:line">lpham@dphllp.com</a>
Texas Bar No. 15895430
CAROLINE C. HARRISON
<a href="mailto:charrison@dphllp.com">charrison@dphllp.com</a>
Texas Bar 24046034

ANTONIO U. ALLEN

<u>aallen@dphllp.com</u> Texas Bar No. 24069045

Dovern Press II approx

#### DOWELL PHAM HARRISON LLP

Tindall Square Bldg. #2 505 Pecan Street, Suite 200 Fort Worth, Texas 76102 (817) 632-6300 (817) 632-6313 (Facsimile)

ATTORNEYS FOR DEFENDANTS E-LOGIC, INC., DWW ABATEMENT, INC., CACTUS ABATEMENT & DEMOLITION, LLC, ONEAL GROUP, INC., AND CHARLES ONEAL

/s/ David W. Dodge

JOHN ISBELL
jisbell@gpm-law.com
Texas Bar No.10432100
DAVID W. DODGE
ddodge@gpm-law.com
Texas Bar No.24002000
GLAST, PHILLIPS & MURRAY, P.C.

14801 Quorum Drive, Suite 500 Dallas, TX 75254

ATTORNEYS FOR DEFENDANTS HESTER ENVIRONMENTAL, LP D/B/A TEAM ENTERPRISE AND PHILIP HESTER

### **CERTIFICATE OF CONFERENCE**

On December 19, 2017, Michael O'Keefe Cowles, counsel for Plaintiffs, communicated his agreement to this motion.

/s/Caroline C. Harrison Caroline C. Harrison

## **CERTIFICATE OF SERVICE**

The foregoing was provided to counsel via e-mail and ECF on December 22, 2017.

Michael O'Keefe Cowles mcowles@equaljusticecenter.org Christopher J. Willett cwillett@equaljusticecenter.org EQUAL JUSTICE CENTER 510 S. Congress Ave., Suite 206 Austin, Texas 78704 (469) 203-2150 (512) 474-0008 (FAX) Attorneys for Plaintiffs

Hannah Alexander
halexander@equaljusticecenter.org
EQUAL JUSTICE CENTER
1250 W. Mockingbird Lane
Suite 455
Dallas, TX 75247
Ph: (469) 228-4226, ext. 302
Attorney for Plaintiffs

<u>/s/Caroline C. Harrison</u> Caroline C. Harrison